

EXHIBIT 1



STATE OF RHODE ISLAND JUDICIARY
SUPERIOR COURT
SUMMONS

Plaintiff Pamela Goodness v. Worldwide United Healthcare, LLC et al. Defendant	Civil Action File Number KC-2025-0603 Attorney for the Plaintiff or the Plaintiff Andrew Bilodeau Address of the Plaintiff's Attorney or the Plaintiff BILODEAU CAPALBO LLC 1350 DIVISION ROAD STE 102 WEST WARWICK RI 02893
Noel Judicial Complex, Kent County 222 Quaker Lane Warwick RI 02886 (401) 822-6900	Address of the Defendant 700 Central Expressway South, Suite 360 Allen TX 75013

TO THE DEFENDANT, Adroit Health Group, LLC:

c/o Corporation Service Co

The above-named Plaintiff has brought an action against you in said Superior Court in the county indicated above. You are hereby summoned and required to serve upon the Plaintiff's attorney, whose address is listed above, an answer to the complaint which is herewith served upon you within twenty (20) days after service of this Summons upon you, exclusive of the day of service.

If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. Your answer must also be filed with the court.

As provided in Rule 13(a) of the Superior Court Rules of Civil Procedure, unless the relief demanded in the complaint is for damage arising out of your ownership, maintenance, operation, or control of a motor vehicle, or unless otherwise provided in Rule 13(a), your answer must state as a counterclaim any related claim which you may have against the Plaintiff, or you will thereafter be barred from making such claim in any other action.

This Summons was generated on 5/21/2025.

/s/ Danielle Keegan
Clerk

Witness the seal/watermark of the Superior Court

5/21/25

A TRUE COPY ATTEST

FRANK V CATAMERO
R.I. CONSTABLE #6022



STATE OF RHODE ISLAND JUDICIARY
SUPERIOR COURT

Plaintiff
 Pamela Goodness
 v.
 Worldwide United Healthcare, LLC et al.
Defendant

Civil Action File Number
 KC-2025-0603

PROOF OF SERVICE

I hereby certify that on the date below I served a copy of this Summons, complaint, Language Assistance Notice, and all other required documents received herewith upon the Defendant, Adroit Health Group, LLC, by delivering or leaving said papers in the following manner:

With the Defendant personally.

At the Defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.

Name of person of suitable age and discretion _____

Address of dwelling house or usual place of abode _____

Age _____

Relationship to the Defendant _____

With an agent authorized by appointment or by law to receive service of process.

Name of authorized agent _____

If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.

With a guardian or conservator of the Defendant.

Name of person and designation _____

By delivering said papers to the attorney general or an assistant attorney general if serving the state.

Upon a public corporation, body, or authority by delivering said papers to any officer, director, or manager.

Name of person and designation _____



STATE OF RHODE ISLAND JUDICIARY
SUPERIOR COURT

Upon a private corporation, domestic or foreign:

By delivering said papers to an officer or a managing or general agent.

Name of person and designation _____

By leaving said papers at the office of the corporation with a person employed therein.

Name of person and designation _____

By delivering said papers to an agent authorized by appointment or by law to receive service of process.

Name of authorized agent _____

If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.

I was unable to make service after the following reasonable attempts:

SERVICE DATE:	____/____/____	SERVICE FEE \$	____/____/____
Month	Day	Year	____/____/____

Signature of SHERIFF or DEPUTY SHERIFF or CONSTABLE

SIGNATURE OF PERSON OTHER THAN A SHERIFF or DEPUTY SHERIFF or CONSTABLE MUST BE NOTARIZED

Signature _____

State of _____
 County of _____

On this _____ day of _____, 20____, before me, the undersigned notary public, personally appeared _____ personally known to the notary or proved to the notary through satisfactory evidence of identification, which was _____, to be the person who signed above in my presence, and who swore or affirmed to the notary that the contents of the document are truthful to the best of his or her knowledge.

Notary Public: _____

My commission expires: _____

Notary identification number: _____

STATE OF RHODE ISLAND
KENT, SC

SUPERIOR COURT

PAMELA GOODNESS,	:	
Plaintiff,	:	
	:	
V.	:	C.A. NO: KC-2025-
	:	
WORLDWIDE UNITED HEALTHCARE	:	
LLC, ADROIT HEALTH GROUP, AND	:	
MERCHANTS BENEFIT	:	
ADMINISTRATION,	:	
Defendants.	:	

COMPLAINT

PARTIES

1. **Plaintiff:** Pamela Goodness, an Rhode Island resident with an address of 49 Amanda Street, Cranston, RI 02920.
2. **Defendant:** Upon information and belief, Worldwide United Healthcare, LLC (“WUH”) is a Florida limited liability company, with an address of 7901 4th Street N, Suite 300, St. Petersburg, Florida.
3. **Defendant:** Upon information and belief, Adroit Health Group, LLC (“AHG”) is a Texas limited liability company with a principal business address of 700 Central Expressway South, Suite 360, Allen, TX 75013 and registered as a foreign limited liability company to do business in the State of Rhode Island.
4. **Defendant:** Upon information and belief, Merchants Benefit Administration, Inc. (“MBA”) is a Scottsdale, Arizona corporation with a principal business address of 18700 N Hayden Road, Suite 390, Scottsdale, AZ 85255, registered as a foreign corporation to do business in the State of Rhode Island.

(WUH, AHG and MBA may at times hereafter be collectively referred to as "Defendants")

JURISDICTION AND VENUE

5. This Court has jurisdiction pursuant to R.I. Gen. Laws § 8-2-14, as the claims arise from unlawful and deceptive conduct perpetrated in Rhode Island.
6. Venue is proper in this Court because the events giving rise to this action occurred in Rhode Island, and Plaintiff resides in this state.

FACTUAL ALLEGATIONS

7. Plaintiff is an elderly resident of Rhode Island who relied on representations made by Defendants in purchasing a health insurance policy.
8. Upon information and belief Defendant, WUH through its agent Ally Cunningham, Agent License # 3002793623 ("Ms. Cunningham"), solicited Plaintiff and promised comprehensive health insurance coverage, including coverage for hospitalization, treatment of serious illnesses, and minimal out-of-pocket expenses.
9. Defendants' representative agent, Ms. Cunningham, specifically promised that Plaintiff's medical needs, including hospitalization and treatment for serious illnesses, would be covered with minimal out-of-pocket expenses.
10. Plaintiff relied on Defendants' false representations and purchased the policy, paying premiums in good faith.
11. Shortly after purchasing the policy, Plaintiff suffered a severe illness requiring hospitalization and medical care, incurring significant medical expenses exceeding \$100,000.
12. Plaintiff was shocked to discover that the policy provided little to no coverage for the treatment she required, contrary to the promises made by Defendant.

13. Despite repeated requests, Defendants failed and refused to provide Plaintiff with a complete copy of the insurance policy and any Explanation of Benefits (“EOB”) upon repeated requests, depriving her of the ability to understand her coverage.
14. Plaintiff has suffered financial harm, emotional distress, and substantial economic losses as a direct result of Defendants’ actions.
15. Defendants’ conduct constitutes fraudulent inducement, elder abuse, and violations of Rhode Island insurance laws and consumer protection statutes.

CAUSES OF ACTION

COUNT I – FRAUDULENT INDUCEMENT

16. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.
17. Defendants knowingly and intentionally misrepresented the scope of coverage provided under the insurance policy to induce Plaintiff to purchase it.
18. Defendants’ representative made these false statements with the intent to deceive Plaintiff and profit from the sale of the policy.
19. Plaintiff relied on these false statements to her detriment, suffering significant financial and emotional harm.

COUNT II – VIOLATION OF THE RHODE ISLAND DECEPTIVE TRADE PRACTICES ACT (DTPA)

20. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.
21. The Rhode Island Deceptive Trade Practices Act, R.I. Gen. Laws § 6-13.1-1, et seq., prohibits deceptive and unfair trade practices, including false representations in the sale of insurance.

22. Defendants engaged in unfair and deceptive trade practices in violation of Rhode Island

General Laws § 6-13.1-1, et seq., by:

- a. Misrepresenting the benefits and coverage of the policy; and
- b. Engaging in predatory practices that exploited Plaintiff's age and vulnerability.

23. Defendants' actions, including misrepresenting the benefits of the policy and failing to

disclose its lack of licensure, constitute violations of the DTPA.

COUNT III – ELDER ABUSE (ECONOMIC EXPLOITATION)

24. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

25. Defendants knowingly exploited Plaintiff, an elderly individual, by inducing her to purchase an insurance policy through deceptive and misleading practices.

26. Defendants' conduct constitutes economic exploitation in violation of Rhode Island laws protecting elderly residents.

COUNT IV – BREACH OF CONTRACT

27. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

28. To the extent that the policy is deemed enforceable, Defendants failed to provide the coverage promised under the terms of the agreement, resulting in Plaintiff's damages.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment against Defendants and award the following relief:

Compensatory damages for financial losses exceeding \$100,000;

- a. Refund of all premiums paid by Plaintiff;
- b. Punitive damages to deter similar conduct in the future;
- c. Statutory damages as provided by Rhode Island law;
- d. Reasonable Attorney's fees and costs; and
- e. Any other relief the Court deems just and proper.

Respectfully Submitted,
Pamela Goodness
By his attorneys,

/s/ Andrew R. Bilodeau
Andrew R. Bilodeau, Esq. #7174
Ryanna T. Capalbo, Esq. #8314
Bilodeau Capalbo, LLC
1350 Division Road, Suite 102
West Warwick, RI 02893
Tel: (401)-300-4055
Fax: (866)-894-4852
abilodeau@bilodeaucapalbo.com
rkapalbo@bilodeaucapalbo.com

Dated: May 20, 2025